

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
BOSTON DIVISION

CAMBRIDGE TAXI DRIVERS AND OWNERS
ASSOCIATION, INC.
PLAINTIFF

v.

CITY OF CAMBRIDGE, MASSACHUSETTS,
NICOLE MURATI FERRER, CHAIR OF THE
CAMBRIDGE LICENSE COMMISSION,
E. DENISE SIMMONS, MAYOR OF CAMBRIDGE,
CHRISTOPHER BURKE,
CAMBRIDGE POLICE COMMISSIONER, and
RICHARD C. ROSSI, CITY MANAGER
DEFENDANTS

Civil Action No.:
1:16-cv-11357-NMG

**PLAINTIFF’S ASSENTED-TO MOTION FOR AN EXTENSION OF TIME TO FILE AN
OPPOSITION TO DEFENDANTS’ MOTION TO DISMISS TO SEPTEMBER 7, 2016**

For the following reasons, Plaintiff Cambridge Taxi Drivers and Owners Association, Inc. (“Plaintiff”), respectfully seeks an enlargement of time to file an opposition to the Motion to Dismiss, which Defendants City of Cambridge, Massachusetts; Nicole Murati Ferrer, Chair of the Cambridge License Commission; E. Denise Simmons, Mayor of Cambridge; Christopher Burke, Cambridge Police Commissioner; and Richard C. Rossi, City Manager (collectively “Defendants”) filed August 16, 2016. Plaintiff asks for a response date **of Wednesday, September 7, 2016.**

Good cause exists for this request because the Motion to Dismiss raises many complex issues and arguments based in theories of preemption and constitutional law. Plaintiff opposes Defendants’ Motion to Dismiss in every count, and requires additional time to prepare such

opposition. Defendants' counsel, Anne Sterman, assented to Plaintiff's request on August 31, 2016.

Respectfully submitted,
Cambridge Taxi Drivers and Owners
Association, Inc., by its attorneys

/s/ Jenifer M. Pinkham
Jenifer M. Pinkham
BBO #658031
Tiffany L. Stichel
BBO # BBO#672713
Schlossberg, LLC
35 Braintree Hill Office Park
Suite 401
Braintree, MA 02184
781.848.5028
jpinkham@sabusinesslaw.com
Date: September 1, 2016

LOCAL RULE 7.1 STATEMENT

I certify that I conferred with Defendants' counsel, Anne Sterman, who indicated her assent to this motion.

/s/ Jenifer M. Pinkham
Jenifer M. Pinkham

CERTIFICATE OF SERVICE

I certify that this document filed through the ECF system will be sent electronically to registered participants as identified on this Notice of Electronic Filing (NEF).

/s/ Tiffany L. Stichel
Tiffany L. Stichel